

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
Charlottesville Division**

ELIZABETH SINES, SETH WISPELWEY,
MARISSA BLAIR, APRIL MUNIZ, MARCUS
MARTIN, NATALIE ROMERO, CHELSEA
ALVARADO, THOMAS BAKER and JOHN
DOE,

Plaintiffs,

v.

JASON KESSLER, et al.,

Defendants.

Civil Action No. 3: 17-cv-00072-NKM

**PLAINTIFFS' MOTION TO SEAL SELECT PORTIONS AND EXHIBITS TO
PLAINTIFFS' RENEWED MOTION FOR SANCTIONS
AGAINST DEFENDANT VANGUARD AMERICA**

On April 23, 2020, Plaintiffs filed a Renewed Motion for Sanctions against Defendant Vanguard America (ECF No. 713, "Plaintiffs' Motion"). For the reasons set forth below, Plaintiffs respectfully request that the Court enter the proposed order sealing certain portions of Plaintiffs' Motion as well as selected exhibits to Plaintiffs' Motion, which were submitted conditionally under seal today in this matter.

Portions of Plaintiffs' Motion and Exhibits 10, 12, 17, 19 through 24 and Exhibits 26 through 28 to Plaintiffs' Motion have all been either designated as Highly Confidential by the producing parties, or contain Confidential or Highly Confidential Information as defined by the Order for the Production of Documents and Exchange of Confidential Information dated January 3, 2018 (ECF No. 167). For the reasons set forth herein, Plaintiffs request that these said portions

of Plaintiffs' Motion and Exhibits 10, 12, 17, 19, 20, 21, 22, 23, 24, 26, 27 and 28 to Plaintiffs' Motion be sealed in accordance with Local Rule 9.

Dated: April 23, 2020

Respectfully submitted,

/s/ Alan Levine

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CERTIFICATE OF SERVICE

I hereby certify that on April 23, 2020 I filed the foregoing with the Clerk of the Court through the CM/ECF system, which will send a notice of electronic filing to:

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I further certify that on April 23, 2020 I served the foregoing upon following *pro se* defendants, via electronic mail, as follows:

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